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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER  
IN SUPPORT OF DEFENDANT META  
PLATFORMS, INC.'S MOTION FOR  
SUMMARY JUDGMENT REGARDING  
CONSOLIDATED CONSUMER CLASS  
ACTION COMPLAINT (Dkt. 87)**

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I  
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this  
4 declaration in support of Meta's Motion for Summary Judgment Regarding the Consolidated  
5 Consumer Class Action Complaint (Dkt. 87).

6 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript  
7 from Sarah Lamdan's merits deposition, held on March 21, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript  
9 from Nicholas Economides's merits deposition, held on March 15, 2024.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Expert  
11 Merits Report of Joseph Farrell, dated January 12, 2024.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the transcript  
13 from Joseph Farrell's merits deposition, held on March 15, 2024.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the Expert  
15 Merits Report of Nicholas Economides, dated January 12, 2024.

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the  
17 Declaration of Nicholas Economides in Support of User Plaintiffs' Motion for Class Certification  
18 Errata, dated July 27, 2023.

19 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the transcript  
20 from Nicholas Economides's class certification deposition, held on September 14, 2023.

21 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of User  
22 Plaintiffs' Second Supplemental Responses and Objections to Interrogatories Nos. 6, 7, and 8 of  
23 Defendant Meta Platforms, Inc.'s Second Set of Interrogatories, dated January 18, 2023.

24 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of User  
25 Plaintiffs' Responses and Objections to Defendant Meta Platforms, Inc.'s Fourth Set of  
26 Interrogatories, dated March 24, 2023.

27 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the  
28 transcript from Sarah Grabert's deposition, held on April 24, 2023.

1           12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the  
2 transcript from Maximilian Klein's deposition, held on May 31, 2023.

3           13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of User  
4 Plaintiffs' Third Supplemental Responses and Objections to Interrogatory No. 1 of Defendant  
5 Meta Platforms, Inc.'s First Set of Interrogatories, dated June 23, 2023.

6           14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of a document  
7 produced in this litigation, Bates numbered GOOG-META-01305868.

8           15. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the  
9 transcript from Christopher DeWolfe's deposition in the matters *Federal Trade Commission v.*  
10 *Meta Platforms, Inc.*, No. 3:22-cv-03590-JEB (D.D.C.) and *Maximilian Klein, et al., v. Meta*  
11 *Platforms, Inc.*, No. 3:20-cv-08570-JD (N.D. Cal.), held on March 10, 2023.

12           16. Attached hereto as Exhibit 15 is a true and correct copy of excerpts of the  
13 transcript from Bradley Horowitz's deposition in the matters *Federal Trade Commission v. Meta*  
14 *Platforms, Inc.*, No. 3:22-cv-03590-JEB (D.D.C.) and *Maximilian Klein, et al., v. Meta*  
15 *Platforms, Inc.*, No. 3:20-cv-08570-JD (N.D. Cal.), held on May 17, 2023.

16  
17 I declare that the foregoing is true and correct under penalty of perjury.

18 Executed on this 5th day of April, 2024, in New York, New York.

19 By: /s/ David Z. Gringer  
20 David Z. Gringer  
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**SIGNATURE ATTESTATION**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta  
Sonal N. Mehta